

Statement of Basis of the Federal Operating Permit

Eastman Chemical Company

Site Name: Eastman Chemical Company Texas Operations

Area Name: U2 - Environmental Services

Physical Location: 300 Kodak Blvd

Nearest City: Longview

County: Harrison

Permit Number: O1981

Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: April 18, 2016

Operating Permit Basis of Determination

Description of Revisions

The FOP minor revision project adds MACT DD requirements to FOP O1981. Specifically, UD187FG1 unit is revised to add MACT DD applicable requirements, which became effective on 03/18/2016. The MACT DD applicable requirement citations are manually added based on an OP-REQ3 form submittal since there is no RRT/flowchart developed for this regulation.

Permit Area Process Description

The U2-Environmental Services application area includes a rotary kiln incinerator, primary and secondary wastewater treatment systems, a fluid bed incinerator, and landfill operations.

The rotary kiln incinerator burns hazardous and non-hazardous wastes. The emission units are storage tanks, the incinerator, and ash containers. Emissions control devices include the incinerator combustion chamber and scrubbers. There are sources of fugitive equipment leaks, heat exchanger leaks, and wastewater. The types of emissions are volatile organic compounds (VOCs), hazardous air pollutants (HAPs), particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NOX), sulfur oxides (SOX), hydrogen chloride (HCl), chlorine (Cl₂), and metals.

Primary and secondary wastewater treatment systems are used to treat process wastewater and contaminated groundwater. The systems include oil and solids removal, equalization and pH adjustment, aeration, and clarification. Emission units are process tanks, storage tanks, oil-water separators, and surface impoundments. There are fugitive equipment leaks, heat exchanger leaks, and wastewater emissions. The types of emissions are VOCs and HAPs.

The fluid bed incinerator burns hazardous and non-hazardous waste including biological sludge from the secondary wastewater treatment system and process organic waste liquids. Emission units are belt presses, storage tanks, the incinerator, scrubbers, and ash containers. Control devices are scrubbers. There are sources of fugitive equipment leaks, heat exchanger leaks, and wastewater. The types of emissions are VOC, HAPs, PM, CO, NOX, SOX, HCl, Cl₂, and metals.

Three landfills are operated on an intermittent basis. One landfill is for disposal of hazardous waste. A second landfill is used for disposal of class 1, 2 and 3 non-hazardous waste. The third landfill is for disposal of class 2 and 3 non-hazardous wastes. Control devices are the dust suppression systems. There are sources of fugitive emissions and wastewater emissions. The types of emissions are VOCs and PM.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1436, O1968, O1970, O1971, O1972, O1973, O1974, O1975, O1976, O1977, O1978, O1979, O1982

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO ₂ , PM, NOX, HAPS, CO, GHG
------------------	---

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide

requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.

9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column “Changes and Exceptions to RRT.” If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word “None” will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled “Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected.”

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
UD187T12A	40 CFR Part 60, Subpart Kb	60Kb-0001	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	
UD187T21	40 CFR Part 61, Subpart FF	61FF-0002a	Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device. Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device. Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF. Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351. Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system. Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3). Closed Vent System and Control Device AMOC = Not using an alternate means of compliance Alternate Monitoring Parameters = Alternate monitoring parameters not requested Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.	
UD187T21	40 CFR Part 61, Subpart FF	61FF-0002b	Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device. Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device. Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF. Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351. Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system. Control Device Type/Operations = Flare Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3). Closed Vent System and Control Device AMOC = Not using an alternate means of compliance Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.	
UD187T24A	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	
UD187T24A	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested. Determined HAL = The emission stream is determined not to be halogenated. Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>§ 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T24A	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187T27	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	
UD187T27	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T27	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187T28	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
UD187T28	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T28	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187T29	40 CFR Part 63, Subpart DD	63DD-0001	<p>Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.</p>	
UD187T29	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T29	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.	
UD187T2A	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	
UD187T2A	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T2A	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187T3A	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	
UD187T3A	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T3A	40 CFR Part 63,	63FFFF-0002b	Designated HAL = The emission stream is not designated as halogenated.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Subpart FFFF		<p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187T4A	40 CFR Part 63, Subpart DD	63DD-0001	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.	
UD187T4A	40 CFR Part 63, Subpart FFFF	63FFFF-0002a	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained under negative pressure.</p>	
UD187T4A	40 CFR Part 63, Subpart FFFF	63FFFF-0002b	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>	
UD187FL1	30 TAC Chapter 111, Visible Emissions	R1111-0001	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>	
UD187FL1	40 CFR Part 60, Subpart A	60A-0001	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>	
UD187FL1	40 CFR Part 63, Subpart A	63A-0001	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Non-assisted</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
UD031FG2	40 CFR Part 61, Subpart J	61J-0001	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS ANY COMPONENT(S) IN BENZENE SERVICE</p> <p>40 CFR 61 (NESHAP) SUBPART J ALTERNATE MEANS OF EMISSION LIMITATION (AMEL) = NOT USING ALTERNATE MEANS OF EMISSION LIMITATION.</p>	
UD031FG2	40 CFR Part 61, Subpart V	61V-0004	<p>Closed-vent Systems = No alternate method of emission limitation is used for closed vent systems or other control devices.</p> <p>Compressors = The fugitive unit contains compressors in VHAP service.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor VHAP service.</p> <p>Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.</p> <p>Sampling Connection Systems = The fugitive unit does not contain sampling connection systems in VHAP service.</p> <p>Vacuum Service = The fugitive unit does not contain components in vacuum service.</p> <p>Valves = The fugitive unit contains valves in VHAP service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for compressors.</p> <p>VHAP Service = The fugitive unit contains components in VHAP service.</p> <p>Complying with 40 CFR § 61.242-11(f)(1) = No closed vent systems are complying with § 61.242-11(f)(1).</p> <p>Pumps = The fugitive unit does not contain pumps in VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for pumps.</p> <p>Complying with 40 CFR § 61.242-11(c) = No enclosed combustion devices are complying with § 61.242-11(c).</p> <p>Complying with 40 CFR § 61.242-11(d) = No flares are complying with § 61.242-11(d).</p> <p>Complying with 40 CFR § 61.242-3 = Compressors are complying with § 61.242-3.</p> <p>Complying with 40 CFR § 61.242-4 = Pressure relief devices in gas/vapor service are complying with § 61.242-4.</p> <p>Complying with 40 CFR § 61.242-5 = No sampling connection systems are complying with § 61.242-5.</p> <p>Complying with 40 CFR § 61.242-7 = Valves are complying with § 61.242-7.</p> <p>Complying with 40 CFR § 61.242-9 = No product accumulator vessels are complying with § 61.242-9.</p> <p>Complying with 40 CFR § 61.242-11(b) = No vapor recovery systems are complying with § 61.242-11(b).</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors in VHAP service.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines in VHAP service.</p> <p>Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.</p> <p>AMEL = No alternate method of emission limitation is used for pressure relief devices in liquid service.</p> <p>Complying with 40 CFR § 61.242-2 = No pumps are complying with 40 CFR § 61.242-2.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Complying with 40 CFR § 61.242-6 = Open-ended valves or lines are complying with § 61.242-6.</p> <p>Complying with 40 CFR § 61.242-8 = No pressure relief devices in liquid service are complying with § 61.242-8.</p> <p>Complying with 40 CFR § 61.242-8 = Flanges and other connectors are complying with § 61.242-8.</p>	
UD119FG1	40 CFR Part 61, Subpart J	61J-0002	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS NO COMPONENT(S) IN BENZENE SERVICE</p> <p>40 CFR 61 (NESHAP) SUBPART J ALTERNATE MEANS OF EMISSION LIMITATION (AMEL) = NOT USING ALTERNATE MEANS OF EMISSION LIMITATION.</p>	
UD187FG1	40 CFR Part 63, Subpart DD	63DD-0003	Existing Source = new equipment leak requirements for equipment in off-site waste service.	The rule citations were determined from an analysis of the rule text and the basis of determination. The manual determination is required since RRT and flow charts will not be developed for these rules.
UD187FG1	40 CFR Part 63, Subpart FFFF	63FFFF-0001	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.	
UD187RKI	40 CFR Part 61, Subpart E	61E-0001	<p>Emission Testing Waiver = No waiver of emission testing was obtained under 40 CFR § 61.13</p> <p>Sludge Sampling = Sludge sampling is conducted to determine compliance with § 61.52(b).</p> <p>Mercury Emissions = Mercury emissions are less than 1,600 grams per 24-hour period</p>	
UD187RKI	40 CFR Part 63, Subpart EEE	63EEE-0001	<p>CO/THC Standard = Complying with the CO standard in § 63.1219(a)(5)(i) or (b)(5)(i).</p> <p>Existing Source = The incinerator is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Baghouse = The furnace is not equipped with a baghouse.</p> <p>Control System = The incinerator is not equipped with a waste heat boiler or a dry air pollution control system.</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The furnace does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Hg Feedrate = Extrapolation of feedrate levels is used for Hg.</p> <p>ALT Metals = Complying with the particulate matter standards.</p> <p>DRE Previous Test = DRE testing during the initial comprehensive performance test is used to document conformance with the DRE standard.</p> <p>MET Feedrate = Extrapolation of feedrate levels is used for semivolatile and low volatile metals.</p>	
UD223FBI	40 CFR Part 61, Subpart E	61E-0002	<p>Emission Testing Waiver = No waiver of emission testing was obtained under 40 CFR § 61.13</p> <p>Sludge Sampling = Sludge sampling is conducted to determine compliance with § 61.52(b).</p> <p>Mercury Emissions = Mercury emissions are less than 1,600 grams per 24-hour period</p>	
UD223FBI	40 CFR Part 63, Subpart EEE	63EEE-0002	<p>CO/THC Standard = Complying with the CO standard in § 63.1219(a)(5)(i) or (b)(5)(i).</p> <p>Existing Source = The incinerator is an existing source (construction or reconstruction commenced on or before</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>April 20, 2004).</p> <p>Baghouse = The furnace is not equipped with a baghouse.</p> <p>Control System = The incinerator is not equipped with a waste heat boiler or a dry air pollution control system.</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The furnace does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>ALT Metals = Complying with the particulate matter standards.</p> <p>DRE Previous Test = DRE testing during the initial comprehensive performance test is used to document conformance with the DRE standard.</p> <p>MET Feedrate = Extrapolation of feedrate levels is used for semivolatile and low volatile metals.</p>	
UD633HLF	40 CFR Part 61, Subpart M	61M-0001	<p>Waste Disposal Site = Active waste disposal site for manufacturing, fabricating, demolition, renovation, and spraying operations, an asbestos mill, or operations that convert asbestos-containing waste material into nonasbestos (asbestos-free) material.</p> <p>Alternate Control Method = The facility is not using an EPA approved alternative control method or no such alternate has been requested.</p> <p>Emissions Compliance = Asbestos containing waste covered with at least 15 centimeters (6 inches) of compacted nonasbestos containing material.</p>	
UD633SLF	40 CFR Part 61, Subpart M	61M-0002	<p>Waste Disposal Site = Active waste disposal site for manufacturing, fabricating, demolition, renovation, and spraying operations, an asbestos mill, or operations that convert asbestos-containing waste material into nonasbestos (asbestos-free) material.</p> <p>Alternate Control Method = The facility is not using an EPA approved alternative control method or no such alternate has been requested.</p> <p>Emissions Compliance = No visible emissions are discharged to the outside air from the active waste disposal site.</p>	
UD187TRSYS	40 CFR Part 63, Subpart DD	63DD-0001	<p>Subject to Another Subpart of 40 CFR Parts 61 or 63 = The transfer system is complying with 40 CFR Part 63, Subpart DD.</p> <p>HAP < 1 Mg per Year = The transfer system is not selected for exemption or does not qualify for exemption under the total annual quantity of HAP (<1 Mg/year) exemption of § 63.683(b)(2)(ii).</p> <p>Numerical Concentration Limits = The transfer system is not exempt under the numerical concentration limits of 40 CFR Part 268, Land Disposal Restrictions.</p> <p>Treated Organic Hazardous Constituents = The organic hazardous constituents are treated according to 40 CFR Part 63, Subpart DD.</p> <p>Air Emission Controls = The volatile organic hazardous air pollutant concentration has not been determined to be less than 500 ppmw and air emissions are controlled in accordance with the standards in 40 CFR § 63.689.</p> <p>Covers Used = The transfer system does not use covers in accordance to 40 CFR § 63.689(d) to control air emissions.</p> <p>Continuous Hard Piping = The transfer system consists of continuous hard piping.</p>	
PRORKI	40 CFR Part 61, Subpart FF	61FF-0003	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Complying with § 61.342(e) = The facility is complying with 40 CFR § 61.342(e).</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in a combustion unit with a</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			destruction efficiency of 99% or greater for benzene. Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).	
PRORKI	40 CFR Part 63, Subpart DD	63DD-0002	Removal or Destruction Method = Incinerator.	
PRORKI	40 CFR Part 63, Subpart FFFF	63FFFF-0003	Series Of Processes = The wastewater stream is treated using a single treatment process. Biological Treatment Process = Non-biological treatment process. Wastewater Stream Designation = The wastewater stream is designated as Group 1 per 40 CFR § 63.132(e). Wastewater Stream Treatment = Resource Conservation and Recovery Act (RCRA) unit option.	

* - The "unit attributes" or operating conditions that determine what requirements apply

** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX476M1	Issuance Date: 07/27/2009
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 17579	Issuance Date: 10/17/2005
Authorization No.: 17833	Issuance Date: 04/02/2012
Authorization No.: 48589	Issuance Date: 01/31/2013
Authorization No.: 84724	Issuance Date: 08/19/2013
Authorization No.: 9167	Issuance Date: 07/27/2009
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.102	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.419	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000

Number: 106.475	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 11/05/1986
Number: 51	Version No./Date: 08/30/1988
Number: 51	Version No./Date: 09/12/1989
Number: 51	Version No./Date: 07/20/1992
Number: 51	Version No./Date: 05/04/1994
Number: 63	Version No./Date: 09/23/1982
Number: 69	Version No./Date: 09/23/1982
Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.: HW50043	

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM

is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: UD633SLF	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 61, Subpart M	SOP Index No.: 61M-0002
Pollutant: 112(B) HAPS	Main Standard: § 61.154(a)
Monitoring Information	
Indicator: Visible emissions	
Minimum Frequency: Once per week, or during each operating period.	
Averaging Period: N/A	
Deviation Limit: The presence of visible emissions.	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semi chemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes

OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes